

# Minnesota Pollution Control Agency



May 27, 2004

The Honorable Judge Raymond R. Krause  
Office of Administrative Hearings  
100 Washington Square, Suite 1700  
Minneapolis, MN 55401-2138

Re: Comments on the Environmental Assessment for EQB Docket No. 04-75-PPS-Xcel  
Blue Lake, OAH Docket No. 2-2901-15938-2

Dear Judge Krause:

The Minnesota Pollution Control Agency (MPCA) submits these comments on the Environmental Assessment (EA) for Xcel Energy's Blue Lake Plant expansion (facility). The MPCA has permitting authority over the facility's air emissions. A draft Air Emissions Permit for the facility is currently on public notice. The public notice started on Friday, May 21, 2004, and will end on June 21, 2004. As drafted, some of the information in the Air Emissions Permit is different from the information in the EA. The MPCA is submitting these comments in order to clarify and update air information.

## Section 2.1.3

Emissions of nitrogen oxides from the two new units combined will be at or below 38.0 tons annually and not 39.5 tons.

## Section 5.1

The criteria pollutants also include total particulate matter (PM) and volatile organic compounds (VOC), but does not include PM<sub>2.5</sub>. Ozone is a criteria pollutant that is not directly emitted. It forms through photochemical reactions in the air from VOCs and NO<sub>x</sub> in the presence of sunlight. This is why the MPCA calculates the inventory of VOC emissions.

## Tables 2, 3, 4, 5

Tables 2, 3, 4, and 5 contain Oil-Fired Simple Cycle information/data that is not relevant to this facility, as the fuel allowed is Natural Gas only.

### Table 4 – Natural Gas and Fuel Estimated Air Emissions Data

Estimated Emission Rates (lbs/MWh) for Natural Gas-Fired Simple Cycle:

SO<sub>2</sub> is 0.03 and not 0.003

NO<sub>x</sub> is 0.366 and not 0.036

PM<sub>10</sub> is 0.055 and not 0.005

CO is 0.186 and not 0.019

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Table 5 - Natural Gas & Fuel Estimated Air Emissions Data

SO<sub>2</sub> (Annual) Ambient Air Quality Standard ( $\mu\text{g}/\text{m}^3$ ) is 60 and not 80.

Estimated Contribution to Ground-level Concentrations for Natural Gas-Fired Simple Cycle ( $\mu\text{g}/\text{m}^3$ ) for:

SO<sub>2</sub> (1-hour) is 1.3 and not <1

CO (1-hour) is 5.7 and not <1

CO (8-hour) is 1.5 and not <1

Table 7 Estimated Air Emissions

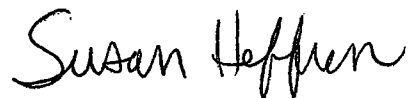
Emissions (tons/yr): NO<sub>x</sub> emissions are limited to 38.0 annually, which lowers the combined operating hours to 1,288 hours per year, not 1,339, and all other pollutant amounts are reduced due to this change.

Table 8 Estimated Maximum Contributions - Ambient Air Quality

Data in this table does not match the data contained in the submittal to the MPCA for modeling results analysis, and hence needs to be revised. Xcel Energy should provide this information to you and the Environmental Quality Board for the record.

If you have questions regarding these comments, please call me at (651) 297-1766.

Sincerely,



Susan Heffron

Technical Representative to the Environmental Quality Board

SH:jae

cc: John Chikkala, MPCA  
Chris Nelson, MPCA  
Bill Storm, EQB